

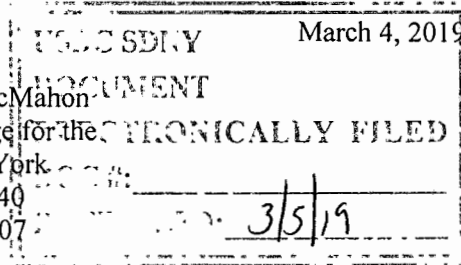


HEPWORTH, GERSHBAUM & ROTH, PLLC.
192 LEXINGTON AVENUE, SUITE 802, NEW YORK, NEW YORK 10016
HGRLAWYERS COM T: (212) 545-1199 F: (212) 532-3801

MEMO ENDORSED

VIA ECF

The Honorable Colleen McMahon
United States District Judge for the Southern District of New York
500 Pearl Street, Room 1640
New York, New York 10007



Re: *Gomez, et al. v. Lace Entertainment, Inc., et al.*
Docket No.: 15-cv-03326 (CM)

OK
Colleen McMahon
3/5/19

Dear Judge McMahon:

We represent Plaintiffs in the above-referenced action. We write, to request that the Court extend the current deadline to submit the stipulated judgment of March 4, 2019 for thirty days making the new deadline April 3, 2019. Briefly, on December 21, 2018, Ms. Kinsley requested a three-week extension to file the stipulated judgment for the final damages amount in connection with the Court's rulings in connection with Defendants' Motion for Summary Judgment and Plaintiffs' Motion for Partial Summary Judgment, thus making it due on January 18, 2019. *See* Dkt. 165. Your Honor granted the request on January 2, 2019. *See* Dkt. 166. Defense counsel requested a second extension on February 18, 2019. *See* Dkt. 169. Your Honor granted this request on February 19, 2019. *See* Dkt. 170.

The undersigned has been waiting to review Defendants' revised calculations and coordinate a stipulated judgment. In February, defense counsel stated she needed to update the spreadsheet to include statutory damages, and we have not yet received the finalized spreadsheet to review. This is Plaintiffs' first request for an extension.

Should the Court have questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

s/ Janine Kapp

Janine Kapp, Esq.

HEPWORTH, GERSHBAUM & ROTH, PLLC

Marc S. Hepworth

Charles Gershbaum

David A. Roth

Rebecca S. Predovan

192 Lexington Avenue, Suite 802

New York, New York 10016

Telephone: (212) 545-1199

Attorneys for Plaintiffs